

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: :

MOTORS LIQUIDATION COMPANY, et al. :
f/k/a General Motors Corp., et al. :

Debtors. :

: Chapter 11
: Case No. 09-50026 (REG)
: (Jointly Administered)
: X

DECLARATION OF STEPHEN M. JURIS

STEPHEN M. JURIS, pursuant to Title 28, United States Code § 1746, hereby declares under penalty of perjury as follows:

1. I am a Principal of the law firm of Morvillo, Abramowitz, Grand, Iason, Anello & Bohrer, P.C., and am duly admitted to practice before the courts of the State of New York and before the United States District Court for the Southern District of New York. I and my firm are counsel to Armstrong World Industries, Inc. Asbestos Personal Injury Settlement Trust, the Celotex Asbestos Settlement Trust, the Babcock & Wilcox Company Asbestos Personal Injury Settlement Trust, the Owens Corning/Fibreboard Asbestos Personal Injury Trust, the DII Industries, LLC Asbestos PI Trust, the United States Gypsum Asbestos Personal Injury Settlement Trust, and the Delaware Claims Processing Facility (collectively, the “**Objectors**”), in the above-captioned action. I submit this Declaration in support of the Objectors’ Opposition to the *Motion of the Official Committee Of Unsecured Creditors of Motors Liquidation Company for an Order Pursuant to Bankruptcy Rule 2004 Directing Production of Documents*. I have personal knowledge of the facts stated in this Declaration.

2. Attached as **Exhibit A** is a true and correct copy of the Order Confirming the Sixth Amended Joint Plan of Reorganization for Owens Corning and Its Affiliated Debtors and Debtors-in-Possession, in In re Owens Corning et al., Case No. 00-03837 (Bankr. D. Del.) (JKF), dated September 26, 2006.

3. Attached as **Exhibit B** is a true and correct copy of relevant excerpts from the Sixth Amended Joint Plan of Reorganization for Owens Corning and Its Affiliated Debtors and Debtors-in-Possession, in In re Owens Corning et al., Case No. 00-03837 (Bankr. D. Del.) (JKF), as approved September 26, 2006.

4. Attached as **Exhibit C** is a true and correct copy of the Order Confirming the First Amended Joint Plan of Reorganization of USG Corporation and Its Debtor Subsidiaries, in In re USG Corporation et al., Case No. 01-2094 (Bankr. D. Del.) (JKF), dated June 15, 2006.

5. Attached as **Exhibit D** is a true and correct copy of the First Amended Joint Plan of Reorganization of USG Corporation and Its Debtor Subsidiaries, in In re USG Corporation et al., Case No. 01-2094 (Bankr. D. Del.) (JKF), as approved June 15, 2006.

6. Attached as **Exhibit E** is a true and correct copy of the Electronic Filer Agreement for the United States Gypsum Asbestos Personal Injury Settlement Trust.

7. Attached as **Exhibit F** is a true and correct copy of the Electronic Filer Agreement for the Owens Corning/Fibreboard Asbestos Personal Injury Trust.

8. Attached as **Exhibit G** is a true and correct copy of the Electronic Filer Agreement for the Armstrong World Industries, Inc. Asbestos Personal Injury Settlement Trust.

9. Attached as **Exhibit H** is a true and correct copy of the Owens Corning/Fibreboard Form of Asbestos Personal Injury Distribution Procedures, as attached to the Order Confirming the Sixth Amended Joint Plan of Reorganization for Owens Corning and Its Affiliated Debtors and Debtors-in-Possession, in In re Owens Corning et al., Case No. 00-03837 (Bankr. D. Del.) (JKF), as approved September 26, 2006.

10. Attached as **Exhibit I** is a true and correct copy of the Owens Corning/Fibreboard Asbestos Personal Injury Trust Alternative Dispute Resolution Procedures, as attached to the

Order Confirming the Sixth Amended Joint Plan of Reorganization for Owens Corning and Its Affiliated Debtors and Debtors-in-Possession, in In re Owens Corning et al., Case No. 00-03837 (Bankr. D. Del.) (JKF), as approved September 26, 2006.

11. Attached as **Exhibit J** is a true and correct copy of the Owens Corning/Fibreboard Asbestos Personal Injury Trust Distribution Procedures, revised as of February 2, 2010.

12. Attached as **Exhibit K** is a true and correct copy of the United States Gypsum Asbestos Personal Injury Settlement Trust Distribution Procedures, revised as of March 29, 2010.

13. Attached as **Exhibit L** is a true and correct copy of the Annual Report and Account of the Owens Corning/Fibreboard Asbestos Personal Injury Trust for the Year Ending December 31, 2009.

14. Attached as **Exhibit M** is a true and correct copy of the Electronic Filer Agreement for the Celotex Asbestos Settlement Trust.

15. Attached as **Exhibit N** is a true and correct copy of the transcript of the December 7, 2006 oral argument in Link v. Ahlstrom Pumps, LLC, 06-M-10-061 (Del. Sup. Ct.) (White, Comm'r).

16. I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
August 2, 2010

_____/s/ Stephen M. Juris_____